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Cincinnati Bell  
Telephone®

R. E. Sigmon  
Vice President - Regulatory Affairs

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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October 12, 1993

Mr. William F. Caton, Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

In the Matter of:

800 Data Base Access Tariffs and the  
800 Service Management System Tariff

DA 93-930  
CC Docket No. 93-129

Dear Mr. Caton:

Enclosed for filing are the original and four copies (4) of Cincinnati Bell Telephone Company's Comments in response to the Bureau's Public Notice released September 27, 1993, in DA 93-1164.

Also provided is a duplicate of this letter and the enclosures. Please date stamp and return this duplicate as acknowledgement of its receipt.

Sincerely,

*Robert E. Sigmon*

Enclosures

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OCT 12 1993

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of

800 Data Base Access Tariffs and the  
800 Service Management System Tariff

CC Docket No. 93-129

COMMENTS OF CINCINNATI BELL TELEPHONE COMPANY

The Common Carrier Bureau's Designation Order in the above-captioned proceeding requires Cincinnati Bell Telephone Company (CBT) and other local exchange carriers (LECs) that use computer models to apportion the investment associated with providing 800 data base service to disclose those models on the record if those models are used to justify 800 data base rates.<sup>1</sup> On September 16, 1993, a petition was filed on behalf of Bell Communications Research, Inc. (Bellcore) requesting a waiver of the Designation Order to the extent it would require LECs to disclose Bellcore's Common Channel Signaling Cost Information System (CCSCIS). CBT hereby offers comments in support of Bellcore's petition pursuant to the Bureau's Public Notice, released September 27, 1993.<sup>2</sup>

As stated in the Description and Justification to CBT's Transmittal No. 622, CBT employed Bellcore's CCSCIS model to calculate the SS7 investments used for 800 data base service. As Bellcore's petition points out, the CCSCIS model is considered a trade secret which contains competitively sensitive and valuable commercial information. By agreement between CBT and Bellcore, CBT is restricted from disclosing the CCSCIS model. Further,

<sup>1</sup> Order Designating Issues for Investigation: DA 93-930, CC Docket No. 93-129, released July 19, 1993 (the "Designation Order"), at para. 37.

<sup>2</sup> Public Notice, DA 93-1164, released September 27, 1993.

CBT is not aware of any other process for developing the investments associated with its 800 data base service that would not use the CCSCIS model. Accordingly, CBT supports Bellcore's waiver request.

Respectfully submitted,

FROST & JACOBS

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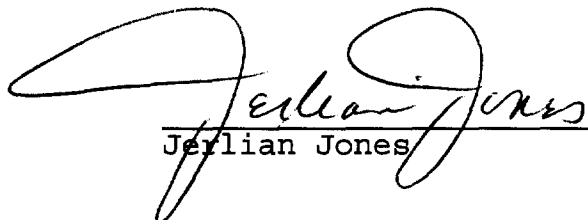
Attorneys for Cincinnati Bell  
Telephone Company

Dated: October 12, 1993

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CERTIFICATE OF SERVICE

I, Jerlian Jones, do hereby certify on this 12th, day of October, 1993, that I have caused a copy of the foregoing Comments of **Cincinnati Bell Telephone Company** to be mailed via first class United States mail, postage prepaid, to the persons on this service list.

  
Jerlian Jones

Mr. William F. Caton, Acting Secretary \*  
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